COLORADO DEPARTMENT OF EDUCATION

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William J. Moloney
Commissioner of Education

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Deputy Commissioner

April 2, 2002

William F. Caton, Acting Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW A325
Washington, DC 20554

Dear Mr. Caton,

Thank you for the opportunity to respond to the Notice of Proposed Rule Making on the federal E-Rate Program. We have seen much progress in the last five years of the program, and we realize that there are many issues still to be considered and solutions to be determined.
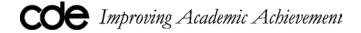
In preparing this response, the Colorado Department of Education met with members of the education and library community to determine our collective opinion on the issues raised in the NPRM. The attached comments reflect a joint opinion of representatives of Colorado's school districts and Colorado's public libraries.

Colorado is a strong supporter of the E-Rate program. Over the years we have allocated staff to work with local schools and libraries to increase the number of applicants for the program and to help them understand how to submit a successful application.

We hope that our comments will allow the program to better serve schools and libraries and that it will assist the SLD in a smoother, more effective administration of the program.

Thank you again for raising these issues for consideration. If you have questions, please call either Nancy Bolt, Colorado State Librarian or Eric Feder, Director, Educational Telecommunications.

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cde *Improving Academic Achievement*

In the Matter of:)

Schools and Libraries Universal)   CC Docket No. 02-6

Service Support Mechanism)

Comments Submitted by the
Colorado Department of Education
Colorado Schools and Libraries Joint Response to the NPRM

Issue: Should the SLD post an online list of specific pre-approved products or services that applicants could choose from on their Form 471?

Paragraphs 13 – 14: Eligible Services List

Colorado Response:

We are concerned that the present process used by the SLD to determine eligibility is akin to playing Russian roulette. The process inhibits schools and libraries from attempting new technologies, i.e. improved services, since service that are proposed but disapproved result in no funding for the upcoming year. We believe that the SLD can achieve its goals of efficiency, predictability, flexibility and reduced administrative costs by maintaining a current, approved, specific services list based upon precedence and statutory law. This list should be supported by specific criteria that applicants can use as guidelines when requesting approval for the E-rate discount.

Additionally, the State recommends the addition of a pre-approval process that would allow applicants to propose and receive expedited responses to requests concerning services not specifically identified on the SLD Eligible Services List. To further this process, the SLD should establish a template for pre-approval requests.

Issue: Is the current WAN policy (specifying that purchased WANs are NOT eligible, but that leased WANs are eligible) fair and effective?

Paragraphs 16 – 20: Wide Area Networks

Colorado Response:

Colorado supports the FCC in broadening the rules governing WAN technology. The WAN policy as it exists is regressive because it is based on out-of-date wireline telecommunications concepts that often lead to implementation of mediocre services with excessive cost.

Requiring that schools and libraries purchase leased WAN services through a common carrier stifles competition by narrowing the list of vendors that can offer this service, in effect ruling out local and perhaps more innovative vendors that might be able to provide a better service at a lower rate. Moreover, if applicants choose to purchase or lease WAN services through a vendor other than a common carrier, they must apply for these services under Priority Two-Internal Connections. For most applicants, Priority Two services are rarely funded because the applicant is required to have such a high discount level.

Wireless WAN services have proven to deliver higher speed access at lower costs and with more reliability than many of the traditional telecommunications common carriers. Schools and libraries should not be constrained to the use of older, out-dated technologies simply because they have a wire attached.

For example, for the past two years one school district in Colorado has placed bids for telecommunications and Internet services through the Form 470 competitive bidding process and found that quotes from the traditional common carriers offered less service and were two to three times more expensive than the quote from the local wireless provider. Today the district still uses the slower land lines to deliver telecommunications and Internet services because it is difficult to secure funding for internal connections that would be needed to upgrade this wireless WAN.

We propose that "the best service with the maximum benefit at minimum cost" should hold the same weight as "Common Carrier Status" and "Wired Land Lines." Furthermore, schools and libraries have a fiduciary responsibility to identify the most efficient way to deliver telecommunications and Internet services to their constituents. By limiting the type of vendor or technology eligible to provide WAN service, the FCC is working against one of the fundamental tenets of the universal service fund--competitive neutrality.

Issue: Should the FCC reconsider their narrow position on wireless technologies?

Paragraph 21: Wireless Technologies

Colorado Response:

Wireless technology has clearly become a substitute for wireline technology in providing Internet access and basic phone services to communities throughout the nation. In many rural areas, wireless technology is the only choice for Internet access, particularly in cases where distance from the school or library to the central telecom office makes it cost prohibitive to connect through traditional wireline. As the technology has changed, the program rules governing this technology need to remain flexible to accommodate the various ways that one can connect to the Internet or support local and long distance phone services. Colorado supports the FCC in broadening the rules governing wireless technology.

Another reason for broadening the eligibility of wireless is to stay in alignment with a fundamental principle of the E-rate program, "competitive neutrality." Requiring that all services go through a telecom provider is anti-competitive. Since wireless serves the same function as wireline technology, it should be considered eligible in the same context as wireline technology.

While broadening the eligibility of wireless is important, it is equally important to reconsider broadening the definition of wireless use in an "educational context." Under current rules, any use of wireless that directly supports the classroom, is considered "educational use."

Libraries also use wireless technology for educational purposes. One example of this is the use of cell phones to answer reference questions both from within the building as staff assist patrons and from outside the building in bookmobiles. Reference staff at the Denver Public Library use cell phones to answer patron questions. Freeing staff from a stationary desk, the cell phones allow them to move through the library to locate any reference materials they need to answer patron questions.

Issue: Should voice mail become an eligible service?

Paragraph 22: Voice Mail

Colorado Response:

Colorado's recommendation is to approve this service. Voice mail is a proven resource that has limitless possibilities to enhance E-Rate funded institutions.

Many education facilities have already implemented voice mail and are realizing what an asset it can be to the organization, community and students in particular. Voice mail provides the ability to post general announcements and to create automated call distributions, which decrease call volume and increase staff productivity. Voice mail proves to be a valuable communication tool for educators and parents. Educators are using voice mail to post homework assignments and school updates on their daily messages, while parents use it to leave messages for the children's teachers. If issues come up, after school when parents and children discuss the school day, the parent can immediately call and leave a message for the teacher to express concern or appreciation. During the daytime, voice mail also minimizes the classroom disruption of phone calls.

Voice mail should be considered eligible under two options. The first is as a purchased service that is contracted as an optional feature provided by the school or library's local exchange carrier. The second option is through a local voice mail system. Not only does this allow customers to select the types of voice mail features they want, but over time it can be an affordable option to a purchased system. While both of these options provide great benefits, even more critical is that, voice mail has become a basic feature of phone service and a ubiquitous communication tool. Furthermore, by allowing voice mail to be an eligible POTS service, the SLD would not waste valuable time auditing POTS requests.

Issue: Should content be allowed to be bundled with Internet Access?

Paragraphs 23-25: Bundling Internet Access with Content

Colorado's Response:

We support maintaining the current rules on bundled Internet content. We understand that in some cases it may be more cost effective to an individual applicant to bundle Internet access with content. It is possible that an applicant could obtain the bundled access and content at a cheaper rate than purchasing both access and content separately.

However, we do not feel this is in the best interest of the program to routinely allow this to take place. If Internet content were eligible for e-rate discounts, we fear some providers

could take advantage of this and offer this only as a bundled service, at a higher cost than Internet access alone. This would constitute abuse of the program's purpose, and would be a drain on the limited funding for the program.

Such access to bundled access and content should be allowed only in very limited circumstances that include:
- When it is clear this is the only option for Internet service;
- On a case by case basis, after close examination; or
- With ample justification.

Issue: Should the FCC continue with their 30% processing benchmark for review of funding requests that include both eligible and ineligible services?

Paragraphs 26-27: Review of Requests for Eligible and Non-Eligible Services

Colorado's Response:

The 30% rule provides the SLD with a strong administrative tool, but it can be a burden on school and library applicants who are kept in the dark regarding what the SLD considers to be eligible and ineligible products and services. Through the practice of rejecting applications that have thousands, tens of thousands or even hundreds of thousands of dollars of eligible expenses if a minority of the requested expenses are ineligible, the SLD is reducing the impact of E-rate on learning in the name of expediency.

This practice should be allowed to continue only if the SLD:
1. Makes readily available to applicants its entire pre-approved eligible item list which represents a "safe harbor." Additional, non-specified, items may be eligible as well; and
2. Provides a mechanism for applicants to contribute new items to this list and guarantees a response from the SLD to the applicant within a specified number of days.

Issue: Should schools and libraries be required to certify on their E-rate applications that they are in compliance with the requirements of the Americans with Disabilities Act (ADA)?

Paragraphs 28-29: Americans with Disability Act

Colorado's Response:

While Colorado fully supports compliance with the Americans with Disabilities Act as a matter of equity, we cannot support tying compliance with ADA to the E-rate for four reasons:
1. Current federal law already mandates compliance with the ADA, and there are already penalties in place for non-compliance.
2. Congress has not directed the FCC to tie compliance with the ADA to the E-Rate, as they did with the CIPA. This is not an area where the FCC should take the initiative outside of Congressional direction.
3. Tying compliance with the ADA to the E-Rate sets a precedence for other issues to also be tied to the E-Rate without Congressional action.

4. The only definition of compliance is that found in the American with Disabilities Act, which means that schools and libraries could not determine what additional compliance, if any, is needed, or whether they are out of compliance.

Consortia Issue #1: Should the FCC modify its rules regarding consortia in order to increase consistency or fairness to them in the program? Should it clarify that only INELIGIBLE members cannot receive below tariff rates?

Paragraphs 30 –31: Change in Section 54.501(d)(1)

Colorado's Response

The FCC has clarified that only private ineligible members of a consortium CANNOT receive below tariff rates. While Colorado appreciates the FCC's effort in clarifying these rules, the rules should not dictate who can join a consortium if it is NOT based on tariff or other services regulated by state and local laws.

Issue: Are there changes to other consortia rules that might achieve a greater consistency or fairness in the FCC approach to the participation of consortia in the program?

Paragraphs 32: Other Changes to Consortia Rules

Colorado's Response:

The two identified Colorado consortia, Three Rivers Library System for the TriPath Network, and Marmot, a provider of automated library services to college, school and public libraries, have certain issues in common: First, given the length of lead time from the date of application to the beginning of the funding year, the two consortia cannot accurately predict which libraries will be receiving consortia services in the E-rate year. These consortia, which consist of independent libraries, can begin or end their services through the consortium as they see fit. Hence, they cannot be forced to participate.

Using the NSLP figures can be quite time consuming and difficult for consortia. Not all school districts apply for E-rate funding. Schools that do apply for the E-rate are likely to be very active in soliciting parents to sign eligibility cards for their child, so that the district can raise its E-rate discount percentage. Other school districts are far less vigilant. Libraries have no role in influencing the process (encouraging parents to "sign up") but must accept the results.

NSLP statistics can be manipulated and are problematic for libraries. Calculating school district discount percentages is another burden on consortia. As mentioned above, not all districts apply for E-rate discounts. For the Year Five Form 471 form, one Colorado consortium was required to perform mathematical calculations for more than 300 schools.

We recommend an alternative means to determine poverty level of libraries that does not involve the National School Lunch Program or averaging poverty levels of school districts.

Issue: Should applicants have the final decision whether to choose discounts or reimbursement?

Paragraph 33-36: Choice of Payment Method

Colorado's Response:

Colorado's position on this issue is that the refusal by a service provider to support both methods of payment constitutes a shifting of administrative expense to the recipient and creates a budgetary burden on participants that partially obviates the financial benefits of the subsidy. Colorado recommends that applicant choice of payment method be made an absolute requirement for service providers in the program.

Another acceptable alternative would be to allow participants to pay *only* the non-discounted portion of their bills *until* they receive reimbursement via the BEAR form process and to require service providers to accommodate this alternative *if they do not support the second form of reimbursement.* This would support a transitional period in which service providers could modify their billing systems, if that is necessary.

We also support the direct payment of BEAR form reimbursements to the recipient, rather than continuing to use the service provider as an intermediary recipient.

If the BEAR payments cannot be made directly to the recipients, the we would like to see the program incorporate enforcement measures regarding remittal of BEAR payments.   These enforcement measures should be financial and punitive in nature for the service providers, perhaps requiring them to issue service credits equal to the BEAR reimbursement amount if remittance is not made within a specified period of time.

The proposed twenty-day remittance period increases the burden of the BEAR process on participants. We believe that all possible steps should be taken to reduce the burden of the BEAR process on the participants. For this reason we support the continuance of the ten-day remittance period, with strong penalties for failure of service providers to comply.

The iterative nature of the BEAR form process and the administrative difficulties it poses to both service providers and participants is a significant problem area of the program. As an alternative, consideration should be given to discontinuing the BEAR form process and to service providers being required to support only the discounted service form of payment. This would have the added benefit of simplifying enforcement measures for the program.

Issue: Should the FCC set a time limit on the number of years that E-rate discounted equipment can be transferred or sold?

Paragraphs 37-40: Equipment Transfer

Colorado's Response:

E-rate recipients who receive discounts for internal wiring (which includes, but is not limited to CSU/DSUs, routers, switches and hubs) should not be allowed to transfer or sell that equipment for a minimum of three years. However, fees on maintenance (such as standard service contracts) should be eligible for E-rate discounts during that three-year period.

Applicants that receive funding for internal connections year after year pose a risk of abuse of program rules if they transfer equipment from a Priority Two eligible entity to one in the system or district that is not eligible to receive this equipment. Moreover, consecutively funding the same applicants for internal connections puts a drain on the Priority Two Funds and makes it difficult for entities that do not fall into the highest discount levels to ever secure funding for internal connections. It is more equitable for schools and libraries with higher discount levels to have slightly older equipment so that others with lower discount levels can also have an opportunity to benefit from new equipment.

Colorado supports the following options in making the distribution of Priority Two funds more equitable:

- Limit equipment transfers to every three years.
  After an initial successful award for internal connections, fund applicants only once every fourth year (However, maintenance on equipment should continue to be eligible every year.)

Issue: Should the FCC's recent decisions to: a) temporarily extend the deadline for all appeals from 30 to 60 days, and b) change the appeal filed date from the receipt date to the postmarked date be made permanent? Also, is 60 days sufficient or should the appeal window be longer?

Paragraph 49: Appeals Procedure

Colorado's Response:

Colorado agrees with extending the applicant deadline to submit an appeal from 30 to 60 days. Applicants could use the extended time to research and acquire materials needed for their appeal case. We also support tying the due date to the postmarked date. Postmarked dates are honored on the Form 470 and 471.

Issue: What should the SLD do if there is not sufficient funding available to fund all successful appeals?

Paragraphs 53-57: Funding of appeals

Colorado's Response

SLD should fund all successful appeals at the full amount due to the applicant. To do anything else would create an inequitable two-tier system. If an applicant's application is, in fact, correct and for eligible items, the applicant should not be penalized because SLD had questions or concerns. Funds for the appeals should come from funds remaining from the current year funds, including those not committed and those committed but not used. Funds that remain from previous years should also be tapped, if necessary.

> - **The response to this issue is related to the issue of rolling over of unused funds. If each year's temporarily unused funds are rolled over, there should be sufficient leeway for SLD to fully fund appeals.**

Issue: Should the SLD be permitted to audit applicants and service providers, at applicant and service provider expense?

Paragraph 58-59: Independent Audits

Colorado's Response:

We understand the importance of conducting audits in cases of suspected fraud or abuse of program rules. However, requiring applicants to pay for their own audits not only subjects them to undue financial burden, but may be redundant since most schools and libraries are audited for other programs. Colorado supports the position that funding for audits should come out of the universal service fund and that audits be performed only under the most serious of circumstances.

An applicant making a good faith effort to follow the process and procedure of the E-rate program can be subjected to an audit through no fault of their own, simply because actions they have taken may appear questionable.

For example, Brush School District in Colorado applied for E-rate discounts for the statewide data network and was awarded funding based on costs for Internet and telecom going through the network.   Unfortunately, in July when services were to start, the state network could not accommodate the school traffic, so the school district had to find a new vendor and complete a SPIN change. The amount of E-rate funds had already been allocated so even though the new vendor charged less, it may have looked as if the district were requesting much more than was needed. They did file a Form 500 canceling additional funds that were anticipated to cover costs of joining the state network, but because of the lengthy application process of filing for a service in January that won't start until July, the funds were already committed.

Issue: Should the FCC bar applicants, providers and consultants from the program if they are engaged in willful or repeated failure to comply and should the ban apply to individuals?

Paragraph 60-61: Prohibitions on Participation

Colorado's Response:

Colorado's position on this issue is that the program should include a well-defined set of rules establishing forfeiture proceedings as a part of its oversight process, with three very important conditions:

1) That the participating school or library not be held complicit in the willful or repeated failure to comply *without strong evidence* and that an on-site investigation of the problem be required;

2) That an interim remedy be made available to recipient schools and libraries before suspending participation in the program; and

3) That the enforcement of the forfeiture not jeopardize continuity of service in rural communities with only a single provider.

The enforcement should also include safeguards (a warning process, for example) against action taken against legitimate applicants "pushing the envelope" and applicants in less sophisticated sites that may make the error of depending on assistance from consultants who may be "gaming" the system.

In any case, there must be definition and broad education of participants as to what constitutes **complicity**, **willful and repeated failure to comply** and the exact consequences and terms of **forfeiture.** The period of forfeiture should be related to the severity of the failure to comply, perhaps with one, two and three year forfeiture periods for these determinations. The program must also undertake to report nationally and regionally the names of organizations and individuals who are prohibited from participation in the process. And some consideration also must be given to reporting organizations and individuals who are actively under investigation.

Lastly, the enforcement process must make provision for "hardship cases" for participant schools and libraries who are to be punished with forfeiture. In such cases we recommend that an outside party be appointed as a conservator of their process to ensure that students and library patrons are not punished and that the penalty not take a form that would end or suspend participation in the program for the school or library, but rather be a fine or administrative suspension of some sort. Perhaps organizations that are required to submit to forfeiture would be allowed to request appointment of a conservator as a condition of remediation, with the other alternative being suspension of participation.

Punishment of service providers or consultants should be consistent with what other sectors of government have established for "failure to comply" issues with vendors.

Issue: Why do applicants and providers fail to fully use committed funds under the program?

Paragraphs 68: Reasons for Non-use of Funds

Colorado's Response:

We can only respond as to why schools and libraries do not fully use their committed funds. Reasons for "unspent funds" include:
1.   The length of time between preparing the application and the beginning of the funding year is one factor. All sorts of changes could have occurred during the six month period. On the applicant level, perhaps the one staff person who understood the E-rate process has left the organization. Perhaps a new library director or district superintendent has chosen to forgo E-rate disbursements because of other demands on personnel.

2.   Change, including bankruptcies and mergers, in the telecommunications industry is another factor. The E-rate process is complex and time-consuming. Depending upon the size of the funding request and the applicant's staff, it might be more cost effective to decide not to go through the process of a SPIN change request, for example.

3.   SLD sets a maximum amount of E-rate disbursements for each individual funding request (which relates to a vendor and a billing account). Applicants must predict expenses up to 18 months in advance. In actuality, the funding request for Service Provider A may end up being "underspent," and the funding request for Service Provider B maybe "overspent". The "overspent" funds are not reimbursed by the SLD. The SLD could change the process so that the maximum amount of the applicant's reimbursement would be

the sum of all the approved funding requests, allowing applicants to overspend and underspend by a certain percentage. Only contracted services can be accurately predicted.

4.   In the period between the application and the funding year, the applicant may have found an alternative service provider that charges lower rates and/or provides better service, and it may be to the applicant's advantage to switch to this other service provider and forgo the E-rate funds.

Issue: Should the FCC credit unused funds to contributors or roll funds over into subsequent years?

Paragraph 69-70. Rollover of funds

Colorado's Response

Colorado definitely supports the rollover of funds and believes the current rule is very clear: "all funding authority for a given funding year that is unused in that funding year shall be carried forward into subsequent funding years for use in accordance with demand." In fact, this has already happened and needs to continue.

Demand for E-rate funds has only increased year after year, and there is no reason to believe it will decrease. Many schools and libraries who are eligible and have high poverty rates (not only those in the 80% and above range) desperately need funding, and the current allocation is not enough to cover their needs. To return funds to contributors would only magnify this problem.

We feel it only fair to also point out that the "contributors" acquire from the general public the funds that they contribute. Returning the funds to the "contributors" probably would not result in a return of any amount to the public that pays for it. In fact, schools and libraries, using these funds to increase technology access, are serving the public that actually contributed the funds.

Finally, to be successful, the program needs the flexibility to use funds from year to year. The problem of fully funding appeals can be partially solved by allowing funds to be carried forward and budgeting to do this.

Other issues:

State replacement contracts:

Applicants that have applied for services under a state contract are required to go through the "State Replacement Contract" procedures outlined by the SLD if this contract expires before or during the E-rate funding year.

Current rules require that once the state begins the competitive bidding process for a new state contract, the state, not the applicant, must file a Form 470. This can be problematic for states that don't have a state office that is familiar with the E-rate program. Finding the appropriate state official to sign the form, explaining the E-rate process, and working with state procurement rules can be quite trying for the applicant.

In Colorado, both the Department of Education and the Colorado School for the Deaf and the Blind are required to purchase long distance telecommunications services from the state contract. However, the State of Colorado does not file E-rate forms. Before Funding Year Five, the state contract expired, and both agencies had to file for state replacement contracts. Currently, the state is in the process of selecting a new vendor for long distance services. However, both agencies may have to forgo E-rate discounts in Year Five, since the state does not file the Form 470. The current process penalizes applicants that are forced to purchase from a state contract, but whose state offices do not file E-rate forms. We believe the competitive bidding process for state contracts is implicit in the process the state uses to select a vendor. Thus, in this case, the Form 470 is unnecessary and redundant.

An alternative to the current state replacement contract procedures would be to make the new contract that the state signs commensurate with the Form 470. Neither the state nor the applicant would need to complete a Form 470. Applicants would simply indicate on the Form 471 the new contract number and list the terms of this agreement in the item 21 attachment.

NSLP Not always a reflection of libraries' poverty level:

The weighted average discount of the school district in which a library is located may not be an accurate reflection of the library's discount level. The SLD does offer alternative measures to use of the NSLP data for schools, but this offer has not been extended to libraries.

An alternative method for determining the level of poverty for libraries would be to use GIS software and U.S. Census data to determine the level of poverty within a certain radius of the library building. Florida State University (FSU) has geo-coded the address of every library building within the U.S. They have then overlaid the 2000 U.S. Census data with the address information, mapping several indicators for library buildings including the poverty level. FSU updates their database of library addresses on a consistent basis.

The Gates Foundation U.S. Library Program uses a similar (if not the same) approach to determine poverty for each library building:
- The U.S. Library Program assigns one type of classification to each library building: urban, urban fringe/large town, or rural. These classifications are based on the Census Bureau's classifications of Urbanized Areas (UA).
- The UA, coupled with population density information, is used to determine the service area of each library building.
- A radius is drawn around each library building. An urban library's service area includes a one mile circle/radius around the building. An urban fringe service area has a radius of three miles. A rural library's service area is defined by a 5 mile radius.
- U.S. Census block data is extracted from within the library radius or adjacent to it, depending on the classification of rural, urban/fringe, or urban.
- Finally, the building service population and the building service population in poverty are derived using GIS software.

Although the data derived through the Gates or FSU methodology would need to be converted to reflect the equivalency of NSLP data and urban/rural status, it is certainly a more accurate indication of the poverty level surrounding the library building.

If the FCC decides that libraries must continue to rely on NSLP data, it would be most equitable to allow them to use the NSLP numbers from the closest elementary school rather than the weighted average of the entire school district. The weighted average of a school district does not necessarily reflect the poverty level of an individual library that falls within that district.

Data:

Colorado commends the FCC on providing data for the first three years of the E-rate program. This data has been helpful in compiling statistics and analyzing the amount of funding allocated to Priority One and Two services for each program year. However, it would be particularly helpful if data could be parsed to specific schools and libraries in consortia. We would also like to know what type of data is available? When is this data available? Finally, in what format is the data available (Adobe, Excel, Access, etc.)?

State Coordinator Issues:

Colorado recommends that the FCC cover the travel costs for state coordinators to attend the E-rate training/update sessions held annually in Washington D.C. The State Library and Department of Education (CDE) in Colorado put a considerable amount of time and effort into advising, training, counseling, and updating applicants on the E-rate program rules and procedures. When applicants experience problems with the process, have frustrations, need help, or want training, they call the state E-rate coordinators. The State Library estimated the staff contribution to E-rate from January of 1998 to February 2001 to be over $122,000. The following is a list of some of the items the state E-rate coordinators provide to applicants:

- Provide local E-rate listserv to disseminate current program updates and announcements
- Read and approve technology plans
- Provide local E-rate web sites—one for schools and one for libraries
- Develop technology planning templates (posted on the web) that include each of the five E-rate components necessary for plan approval
- Provide technology planning consultation and training
- Provide training sessions on Forms 470 and 471
- Assist individuals with specific E-rate problems.